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6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT OF NEVADA**

8 TARLOK SINGH KHAKH,) Case No.: 2:22-cv-00519-CDS-EJY
9)
10 Plaintiff,) **STIPULATION AND ORDER TO**
10) **EXTEND DISCOVERY**
11 vs.) **DEADLINES**
11)
12 BHAJAN SIDHU dba SMOKE 4 U,) **(FIRST REQUEST)**
13)
13 Defendant.)
14)

15 IT IS HEREBY STIPULATED AND AGREED, by and between the parties'
16 counsel of record, that discovery deadlines in the Discovery Plan and Scheduling
17 Order (ECF No. 10) be extended ninety days (90) days to allow the parties to serve
18 written discovery, for Defendant to take the Plaintiff's deposition, and for Plaintiff to
19 take the deposition of Defendant's 30(b)(6) witness(es). The parties are exploring
20 possible resolution of the claims prior to providing notices for depositions, and
21 respectfully request additional time to complete discovery in this case. Accordingly,
22 the parties are also requesting the following deadlines also be modified:

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Description of Discovery Deadline	Current Discovery Deadline	Proposed Discovery Deadline
Discovery Cut Off	December 26, 2022	March 27, 2023 (as the 90 th day is Sunday, March 26, 2023)
Dispositive Motion(s)	January 25, 2023	April 26, 2023
Joint Pretrial Order ¹	February 24, 2023	May 26, 2023

The parties provide the following information to the Court regarding the proposed extension of the discovery deadline. The reason for the parties' inability to comply with this deadline is to explore possible resolution of the claims, and if resolution is not reached, to coordinate multiple schedules and engage multiple translators to conduct the necessary depositions for this case.

Discovery Completed To Date

The parties have exchanged their initial disclosures. Defendant has served requests for production and request for interrogatories on Plaintiff, for which responses are not yet due.

Remaining Discovery To Be Completed

Plaintiff intends to serve an initial set of written discovery; Defendant intends to conduct the deposition(s) of Plaintiff; Plaintiff intends to conduct the depositions of Rule 30(b)(6) designees; depositions may also be conducted of any current or former employees; and the parties may also conduct additional related written discovery.

Reasons Discovery Could Not Be Completed Within The Existing Deadline

The parties have been exploring possible resolution and recently settled a related matter. They continue to make progress in this matter but have agreed if resolution is not reached, to coordinate multiple schedules for and conduct necessary depositions in order to fully evaluate the claims and defenses presented. This

¹ If dispositive motions are filed, the Joint Pretrial Order will be due thirty (30) days after the Court enters its decision on any dispositive motion(s).

1 extension will allow the parties to conduct depositions prior to the close of the
2 proposed discovery period.

3 This is the parties' first request for an extension of the discovery deadline date
4 and is not made to delay this matter. Based upon the foregoing, the parties believe
5 there is good cause for the requested extension.

6 Dated this 5th day of December, 2022.

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8 FISHER & PHILLIPS LLP

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10 /s/ Lisa A. McClane, Esq.
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15 **ORDER**

16 IT IS SO ORDERED:

17 
18 UNITED STATES MAGISTRATE JUDGE

19 December 5, 2022

20 DATED

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